

1 ARIEL E. STERN, ESQ.  
Nevada Bar No. 8276  
2 **AKERMAN LLP**  
1635 Village Center Circle, Suite 200  
3 Las Vegas, Nevada 89134  
Telephone: (702) 634-5000  
4 Facsimile: (702) 380-8572  
Email: ariel.stern@akerman.com

5  
6 MICHAEL D. NAPOLI, ESQ.  
*PRO HAC VICE*  
**AKERMAN LLP**  
2001 Ross Avenue, Suite 3600  
7 Dallas, Texas 75201  
Telephone: (214) 720-4360  
8 Facsimile: (214) 720-8116

9  
10 *Attorneys for party in interest Tecumseh – Infinity  
Medical Receivables Fund, L.P.*

11 **UNITED STATES BANKRUPTCY COURT**

12 **DISTRICT OF NEVADA**

13 In re:

14 INFINITY CAPITAL  
MANAGEMENT, INC;  
15 dba INFINITY HEALTH CONNECTIONS

16 Debtor.

Case No.: 21-14486-abl  
Chapter 7

**NOTICE OF HEARING ON MOTION TO  
ABANDON AND LIFT THE AUTOMATIC  
STAY**

Hearing Date: November 17, 2021  
Hearing Time: 9:30 a.m.  
Location: Telephonic Hearing Only<sup>1</sup>

20 **NOTICE IS HEREBY GIVEN** that a motion entitled *Motion to Abandon Property and (2)*  
21 *Lift the Automatic Stay* [ECF 57] (the "Motion") was filed on October 5, 2021 by Tecumseh –  
22 Infinity Medical Receivable Fund, LP, ("Tecumseh"), a party in interest. The Motion seeks (1)  
23 abandonment, and transfer to of all Tecumseh receivables to Tecumseh and (2) that the Automatic  
24 Stay be lifted in relation to the same. Any opposition must be filed pursuant to Local Rule 9014.

27 <sup>1</sup> This hearing will be heard telephonically. Check the Bankruptcy Court's website prior to the hearing for the call-in  
28 number, at: <https://www.nvb.uscourts.gov/calendars/court-calendars/>. The calendar for this hearing will be posted under  
"Duty Judges (Chapter 7 & 13) a few days prior to the hearing. Select the pdf for the Chapter 7 calendar for the date  
listed above, and the call-in information for the hearing will be identified at the top of that pdf.

**NOTICE IS FURTHER GIVEN** that the hearing on the Motion will be held before a U.S. Bankruptcy Judge at the time and place specified in the caption to this document. This hearing may be continued from time to time without further notice to you.

**NOTICE IS FURTHER GIVEN** that a copy of the Motion may be obtained from either: (i) the Bankruptcy Clerk located on the Fourth Floor of the Foley Federal Building, 300 Las Vegas Boulevard South Las Vegas, Nevada 89101; or (ii) by contacting the Tecumseh's counsel Michael Napoli, at either (214) 720-4360 or by email at [michael.napoli@akerman.com](mailto:michael.napoli@akerman.com).

**NOTICE IS FURTHER GIVEN** that if you do not want the court to grant the relief sought in the Motion, or if you want the court to consider your views, then you must file an opposition with the court, and serve a copy to the Tecumseh's counsel no later than 14 days preceding the hearing date for the Motion, unless an exception applies (see Local Rule 9014(d)(3)). The opposition must state your position, set forth all relevant facts and legal authority, and be supported by affidavits or declarations that conform to LR 9014(c).

If you object to the relief requested you *must* file a **WRITTEN** response to this pleading with the court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing.

DATED: October 7, 2021.

**AKERMAN LLP**

/s/ Michael Napoli, Esq

ARIEL E. STERN, ESQ.

Nevada Bar No. 8276

1635 Village Center Circle, Suite 200

Las Vegas, Nevada 89134

MICHAEL D. NAPOLI, ESQ.

*PRO HAC VICE*

2001 Ross Avenue, Suite 3600

Dallas, Texas 75201

AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200  
LAS VEGAS, NEVADA 89134  
TEL.: (702) 634-5000 – FAX: (702) 380-8572

*Attorneys for party in interest Tecumseh – Infinity  
Medical Receivables Fund, L.P.*

**AKERMAN LLP**

1635 VILLAGE CENTER CIRCLE, SUITE 200  
LAS VEGAS< NEVADA 89134  
TEL.: (702) 634-5000 – FAX: (702) 380-8572

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28